



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

SLR:SDE

*271 Cadman Plaza East  
Brooklyn, New York 11201*

March 8, 2016

By ECF

The Honorable Roslynn R. Mauskopf  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *Wilfred King v. United States of America, et al.,*  
Civil Action No. CV-14-6488 (Mauskopf, J.)(Orenstein, M.J.)

Dear Judge Mauskopf:

This Office represents defendants United States of America, Frank Strada, Robert Beaudouin, M.D., and Michael Borecky, M.D. (hereinafter collectively "defendants") in this action alleging medical malpractice and deliberate indifference to serious medical needs stemming from medical care provided to plaintiff while he was an inmate at MDC Brooklyn. The parties have settled this matter. Enclosed, pursuant to the parties' settlement agreement, please find a stipulation and proposed order of dismissal with prejudice for the Court's review and endorsement.

We thank the Court for its consideration herein.

Respectfully submitted,

ROBERT L. CAPERS  
United States Attorney

By: /S/  
Seth D. Eichenholtz  
Assistant U.S. Attorney  
718-254-7036  
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cc: Rehan Nazrali, Esq. (by ECF)  
Attorney for Plaintiff

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

WILFRED KING,

Plaintiff,

-against-

THE UNITED STATES OF AMERICA,  
WARDEN FRANK STRADA, ROBERT  
BEAUDOUIN M.D., Agency Medical Director,  
MICHAEL BORECKY M.D. and "JOHN DOES  
NOS 1-11,"

Defendants.

Civil Action No.  
CV-14-6488

(Mauskopf, J.)  
(Orenstein, M.J.)

**STIPULATION AND ORDER OF DISMISSAL WITH PREJUDICE**

IT IS HEREBY STIPULATED AND AGREED, by and between the parties of the above-entitled action, by their respective undersigned attorneys, that Plaintiff's Amended Complaint and all claims therein be and hereby are dismissed with prejudice pursuant to Rule 41(a)(1)(ii) of the Federal Rules of Civil Procedure.

Each party hereto agrees that this dismissal is without costs or fees. The parties further agree that no further suit will be instituted for the same causes of action which have been asserted herein, or for any other causes of action arising out of the incidents or circumstances



*Wilfred King v. United States, et al., 14-CV-6488 (RMM)(JO)*

*Stipulation of Dismissal*

which gave rise to this lawsuit.

Dated: March 7, 2016  
New York, New York

REHAN NAZRALI, ESQ.  
*Attorney for Plaintiff*  
305 Broadway, 14th Floor  
New York, NY 10007

By: \_\_\_\_\_

Rehan Nazrali

Dated: March \_\_, 2016  
Brooklyn, New York

ROBERT L. CAPERS  
United States Attorney  
Eastern District of New York  
*Attorney for Defendants*  
271 Cadman Plaza East  
Brooklyn, New York 11201

By: \_\_\_\_\_

/s/

Seth D. Eichenholtz  
Assistant United States Attorney  
(718) 254-7036  
Seth.Eichenholtz@usdoj.gov

SO ORDERED this

\_\_\_\_\_ day of \_\_\_\_\_, 2016

\_\_\_\_\_  
HONORABLE ROSLYNN R. MAUSKOPF  
United States District Judge